

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL  
SOFTWARE ANTITRUST LITIGATION  
(NO. II)**

**Case No. 3:23-MD-3071  
MDL No. 3071**

**This Document Relates to:  
3:23-cv-00378**

**Chief Judge Waverly D. Crenshaw, Jr.**

**ANSWER OF DEFENDANT LANTOWER LUXURY LIVING LLC TO MULTIFAMILY  
PLAINTIFFS' SECOND AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

Defendant Lantower Luxury Living LLC (“Lantower”), by and through their undersigned counsel of record, answers Plaintiffs’ Second Amended Consolidated Class Action Complaint (“SAC”), Dkt. 728, and allege additional or affirmative defenses as follows. Lantower denies each and every allegation in the SAC’s section headings and in all portions of the SAC not contained in numbered Paragraphs, including without limitation any and all charts, figures, tables, exhibits and appendices. To the extent that the SAC’s allegations concern persons and/or entities other than Lantower, Lantower denies that such allegations support any claim for relief against Lantower.

**I. Introductory Allegations**

1. Lantower avers that the allegations of Paragraph 1 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 1 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 1 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

2. To the extent that the allegations of Paragraph 2 are definitional, Lantower avers that no response is required. To the extent that a response is required and to the extent that the

allegations of Paragraph 2 relate to other defendants, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 2, with the exception of matters specifically admitted herein as follows. Lantower admits that Plaintiffs in the SAC purport to refer to (i) Lease Rent Options as “LRO,” (ii) AI Revenue Management as “AIRM,” and (iii) RealPage revenue management software solutions, including Revenue Management, LRO, YieldStar, and AI Revenue Management, collectively as “Revenue Management Solutions” or “RMS,” although Lantower disputes the propriety of such definitions and any inferences arising therefrom.

3. Lantower avers that the allegations of Paragraph 3 constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 3 relate to other defendants, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 3, with the exception of matters specifically admitted herein as follows. Lantower admits that it owns and operates certain multifamily residential properties.

4. To the extent that the allegations of Paragraph 4 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 4 relate to Lantower, Lantower denies all of those allegations.

5. To the extent that the allegations of Paragraph 5 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and

therefore denies them. To the extent the allegations of Paragraph 5 relate to Lantower, Lantower denies all of those allegations.

6. Lantower avers that the allegations of Paragraph 6 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 6 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 6 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

7. To the extent that the allegations of Paragraph 7 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 7 relate to Lantower, Lantower denies all of those allegations.

8. Lantower avers that the allegations of Paragraph 8 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 8 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 8 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

## **II. Background Allegations**

9. To the extent that the allegations of Paragraph 9 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 9 relate to Lantower, Lantower denies all of those allegations.

10. To the extent that the allegations of Paragraph 10 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and

therefore denies them. To the extent the allegations of Paragraph 10 relate to Lantower, Lantower denies all of those allegations.

11. To the extent that the allegations of Paragraph 11 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 11 relate to Lantower, Lantower denies all of those allegations.

12. To the extent that the allegations of Paragraph 12 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 12 relate to Lantower, Lantower denies all of those allegations.

13. Lantower avers that the allegations of Paragraph 13 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 13 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 13 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

14. Lantower avers that the allegations of Paragraph 14 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 14 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 14 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

15. To the extent that the allegations of Paragraph 15 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and

therefore denies them. To the extent the allegations of Paragraph 15 relate to Lantower, Lantower denies all of those allegations.

16. Lantower avers that the allegations of Paragraph 16 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 16 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 16 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

17. To the extent that the allegations of Paragraph 17 are definitional, Lantower avers that no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 17 relate to other defendants, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 17, with the exception of matters specifically admitted herein as follows. Lantower acknowledges that Plaintiffs in the SAC purport to use the terms “Pricing Advisors” and “Revenue Managers” interchangeably, although Lantower disputes the propriety of these terms and any inferences arising therefrom. Further, Lantower admits that, at times, it has communicated with one more persons it has understood be an assigned RealPage Pricing Advisor.

18. To the extent that the allegations of Paragraph 18 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 18 relate to Lantower, Lantower denies all of those allegations.

19. To the extent that the allegations of Paragraph 19 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and

therefore denies them. To the extent the allegations of Paragraph 19 relate to Lantower, Lantower denies all of those allegations.

20. To the extent that the allegations of Paragraph 20 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 20 relate to Lantower, Lantower denies all of those allegations.

21. To the extent that the allegations of Paragraph 21 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 21 relate to Lantower, Lantower denies all of those allegations.

22. To the extent that the allegations of Paragraph 22 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 22 relate to Lantower, Lantower denies all of those allegations.

23. To the extent that the allegations of Paragraph 23 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 23 relate to Lantower, Lantower denies all of those allegations.

24. To the extent that the allegations of Paragraph 24 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 24 relate to Lantower, Lantower denies all of those allegations.

25. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 25, and therefore denies them.

26. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 26, and therefore denies them.

27. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 27, and therefore denies them.

28. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 28, and therefore denies them.

29. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 29, and therefore denies them.

30. To the extent that the allegations of Paragraph 30 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 30 relate to Lantower, Lantower denies all of those allegations.

31. To the extent that the allegations of Paragraph 31 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 31 relate to Lantower, Lantower denies all of those allegations.

32. To the extent that the allegations of Paragraph 32 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 32 relate to Lantower, Lantower denies all of those allegations.

33. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 33, and therefore denies them.

34. To the extent that the allegations of Paragraph 34 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 34 relate to Lantower, Lantower denies all of those allegations.

35. To the extent that the allegations of Paragraph 35 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 35 relate to Lantower, Lantower denies all of those allegations.

36. To the extent that the allegations of Paragraph 36 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 36 relate to Lantower, Lantower denies all of those allegations.

37. Lantower avers that the allegations of Paragraph 37 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 37 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 37 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

38. To the extent that the allegations of Paragraph 38 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 38 relate to Lantower, Lantower denies all of those allegations.



39. Lantower avers that the allegations of Paragraph 39 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 39 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 39 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

40. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 40, and therefore denies them.

41. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 41, and therefore denies them.

42. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 42, and therefore denies them.

43. Lantower avers that the allegations of Paragraph 43 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 43 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 43 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

### **III. Allegations Concerning Jurisdiction and Venue**

44. Lantower admits that Plaintiffs purport to invoke the cited statutory provisions, but otherwise denies the allegations of Paragraph 44.

45. Lantower avers that the allegations of Paragraph 45 regarding subject matter jurisdiction constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required, and to the extent that allegations of Paragraph 45 relate to Lantower, Lantower denies all of the allegations of Paragraph 45.

46. Lantower avers that the allegations of Paragraph 46 regarding venue constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required, and to the extent that allegations of Paragraph 46 relate to Lantower, Lantower denies all of the allegations of Paragraph 46, with the exception of matters specifically admitted herein as follows. Lantower admits that the Judicial Panel on Multidistrict Litigation issued an order transferring certain related actions to this District, including an action originally filed in the Southern District of Florida naming Lantower as a defendant. To the extent that the allegations of Paragraph 46 relate to other defendants, Lantower lacks knowledge or information sufficient to form a belief as to the truth of those allegations, and therefore denies them.

47. Lantower avers that the allegations of Paragraph 47 regarding personal jurisdiction constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required, and to the extent that allegations of Paragraph 47 relate to Lantower, Lantower denies all of the allegations of Paragraph 47.

48. Lantower avers that the allegations of Paragraph 48 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 48 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 48 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

49. Lantower avers that the allegations of Paragraph 49 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 49 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 49 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

#### **IV. Allegations Concerning Parties**

50. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 50, and therefore denies them.

51. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 51, and therefore denies them.

52. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 52, and therefore denies them.

53. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 53, and therefore denies them.

54. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 54, and therefore denies them.

55. To Lantower avers that the allegations of Paragraph 55 constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 55 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 55, with the exception of matters specifically admitted herein as follows. Lantower admits that Plaintiffs Priscilla Parker and Patrick Parker entered into leases for housing at the Lantower Asturia property in Odessa, Florida. Lantower further admits that it has utilized the YieldStar product in connection with management of the Lantower Asturia property. Finally, Lantower avers that Plaintiffs Priscilla Parker and Patrick Parker specifically waived their rights to a jury trial in their leases for housing at the Lantower Asturia.

56. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 56, and therefore denies them.

57. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 57, and therefore denies them.

58. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 58, and therefore denies them.

59. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 59, and therefore denies them.

60. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 60, and therefore denies them.

61. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 61, and therefore denies them.

62. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 62, and therefore denies them.

63. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 63, and therefore denies them.

64. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 64, and therefore denies them.

65. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 65, and therefore denies them.

66. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 66, and therefore denies them.

67. To the extent that the allegations of Paragraph 67 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and

therefore denies them. To the extent the allegations of Paragraph 67 relate to Lantower, Lantower denies all of those allegations.

68. Lantower avers that the allegations of Paragraph 68 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 68 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 68 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

69. To the extent that the allegations of Paragraph 69 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 69 relate to Lantower, Lantower denies all of those allegations.

70. Lantower avers that the allegations of Paragraph 70 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 70 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 70 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

71. To the extent that the allegations of Paragraph 71 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 71 relate to Lantower, Lantower denies all of those allegations.

72. Lantower avers that the allegations of Paragraph 72 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 72 to the extent they purport to pertain to Lantower. Further, to the extent

that the allegations of Paragraph 72 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

73. To the extent that the allegations of Paragraph 73 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 73 relate to Lantower, Lantower denies all of those allegations.

74. Lantower avers that the allegations of Paragraph 74 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 74 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 74 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

75. Lantower avers that the allegations of Paragraph 75 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 75 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 75 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

76. To the extent that the allegations of Paragraph 76 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 76 relate to Lantower, Lantower denies all of those allegations.

77. Lantower avers that the allegations of Paragraph 77 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 77 to the extent they purport to pertain to Lantower. Further, to the extent

that the allegations of Paragraph 77 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

78. Lantower avers that the allegations of Paragraph 78 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 78 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 78 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

79. To the extent that the allegations of Paragraph 79 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 79 relate to Lantower, Lantower denies all of those allegations.

80. Lantower avers that the allegations of Paragraph 80 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 80 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 80 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

81. Lantower avers that the allegations of Paragraph 81 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 81 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 81 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

82. To the extent that the allegations of Paragraph 82 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and

therefore denies them. To the extent the allegations of Paragraph 82 relate to Lantower, Lantower denies all of those allegations.

83. Lantower avers that the allegations of Paragraph 83 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 83 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 83 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

84. To the extent that the allegations of Paragraph 84 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 84 relate to Lantower, Lantower denies all of those allegations.

85. Lantower avers that the allegations of Paragraph 85 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 85 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 85 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

86. Lantower avers that the allegations of Paragraph 86 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 86 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 86 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

87. To the extent that the allegations of Paragraph 87 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and



therefore denies them. To the extent the allegations of Paragraph 87 relate to Lantower, Lantower denies all of those allegations.

88. Lantower avers that the allegations of Paragraph 88 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 88 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 88 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

89. Lantower avers that the allegations of Paragraph 89 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 89 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 89 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

90. To the extent that the allegations of Paragraph 90 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 90 relate to Lantower, Lantower denies all of those allegations.

91. Lantower avers that the allegations of Paragraph 91 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 91 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 91 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

92. Lantower avers that the allegations of Paragraph 92 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the

allegations of Paragraph 92 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 92 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

93. To the extent that the allegations of Paragraph 93 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 93 relate to Lantower, Lantower denies all of those allegations.

94. Lantower avers that the allegations of Paragraph 94 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 94 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 94 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

95. Lantower avers that the allegations of Paragraph 95 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 95 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 95 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

96. To the extent that the allegations of Paragraph 96 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 96 relate to Lantower, Lantower denies all of those allegations.

97. Lantower avers that the allegations of Paragraph 97 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the

allegations of Paragraph 97 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 97 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

98. Lantower avers that the allegations of Paragraph 98 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 98 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 98 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

99. To the extent that the allegations of Paragraph 99 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 99 relate to Lantower, Lantower denies all of those allegations.

100. Lantower avers that the allegations of Paragraph 100 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 100 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 100 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

101. Lantower avers that the allegations of Paragraph 101 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 101 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 101 relate to other defendants or other persons, Lantower

lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

102. To the extent that the allegations of Paragraph 102 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 102 relate to Lantower, Lantower denies all of those allegations.

103. Lantower avers that the allegations of Paragraph 103 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 103 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 103 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

104. Lantower avers that the allegations of Paragraph 104 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 104 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 104 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

105. To the extent that the allegations of Paragraph 105 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 105 relate to Lantower, Lantower denies all of those allegations.

106. Lantower avers that the allegations of Paragraph 106 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 106 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 106 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

107. Lantower avers that the allegations of Paragraph 107 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 107 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 107 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

108. To the extent that the allegations of Paragraph 108 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 108 relate to Lantower, Lantower denies all of those allegations.

109. Lantower avers that the allegations of Paragraph 109 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 109 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 109 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

110. Lantower avers that the allegations of Paragraph 110 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 110 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 110 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

111. To the extent that the allegations of Paragraph 111 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 111 relate to Lantower, Lantower denies all of those allegations.

112. Lantower avers that the allegations of Paragraph 112 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 112 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 112 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

113. Lantower avers that the allegations of Paragraph 113 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 113 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 113 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

114. To the extent that the allegations of Paragraph 114 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 114 relate to Lantower, Lantower denies all of those allegations.

115. Lantower avers that the allegations of Paragraph 115 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 115 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 115 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

116. Lantower avers that the allegations of Paragraph 116 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 116 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 116 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

117. To the extent that the allegations of Paragraph 117 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 117 relate to Lantower, Lantower denies all of those allegations.

118. Lantower avers that the allegations of Paragraph 118 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 118 to the extent they purport to pertain to Lantower. Further, to the

extent that the allegations of Paragraph 118 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

119. Lantower avers that the allegations of Paragraph 119 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 119 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 119 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

120. To the extent that the allegations of Paragraph 120 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 120 relate to Lantower, Lantower denies all of those allegations.

121. Lantower avers that the allegations of Paragraph 121 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 121 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 121 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

122. Lantower avers that the allegations of Paragraph 122 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 122 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 122 relate to other defendants or other persons, Lantower



lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

123. To the extent that the allegations of Paragraph 123 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 123 relate to Lantower, Lantower denies all of those allegations.

124. Lantower avers that the allegations of Paragraph 124 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 124 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 124 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

125. Lantower avers that the allegations of Paragraph 125 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 125 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 125 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

126. To the extent that the allegations of Paragraph 126 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 126 relate to Lantower, Lantower denies all of those allegations.

127. Lantower avers that the allegations of Paragraph 127 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 127 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 127 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

128. Lantower avers that the allegations of Paragraph 128 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 128 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 128 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

129. To the extent that the allegations of Paragraph 129 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 129 relate to Lantower, Lantower denies all of those allegations.

130. Lantower avers that the allegations of Paragraph 130 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 130 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 130 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

131. Lantower avers that the allegations of Paragraph 131 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 131 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 131 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

132. To the extent that the allegations of Paragraph 132 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 132 relate to Lantower, Lantower denies all of those allegations.

133. Lantower avers that the allegations of Paragraph 133 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 133 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 133 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

134. Lantower avers that the allegations of Paragraph 134 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 134 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 134 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

135. To the extent that the allegations of Paragraph 135 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 135 relate to Lantower, Lantower denies all of those allegations.

136. Lantower avers that the allegations of Paragraph 136 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 136 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 136 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

137. Lantower avers that the allegations of Paragraph 137 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 137 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 137 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

138. To the extent that the allegations of Paragraph 138 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 138 relate to Lantower, Lantower denies all of those allegations, with the exception of matters specifically admitted herein as follows. Lantower admits that Plaintiffs in the SAC purport to refer to Lantower Luxury Living LLC as “Lantower.” Lantower further admits that it is a limited liability company headquartered in Dallas Texas, and organized and existing under the laws of Delaware. Further, Lantower admits

that it operates certain properties in the Austin, Charlotte, Dallas, Miami, Orlando, Raleigh, and Tampa areas.

139. Lantower avers that the allegations of Paragraph 139 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 139 to the extent they purport to pertain to Lantower, with the exception of matters specifically admitted herein as follows. Lantower admits that it has utilized RealPage's YieldStar product in connection with the management of some of its properties. Lantower also admits that Laura Scales has been employed as a Revenue Manager for Lantower and has familiarity with Lantower's use of the YieldStar product. To the extent that the allegations of paragraph 139 relate to other defendants or persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

140. Lantower avers that the allegations of Paragraph 140 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 140 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 140 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

141. To the extent that the allegations of Paragraph 141 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 141 relate to Lantower, Lantower denies all of those allegations.

142. Lantower avers that the allegations of Paragraph 142 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the

allegations of Paragraph 142 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 142 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

143. Lantower avers that the allegations of Paragraph 143 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 143 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 143 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

144. Lantower avers that the allegations of Paragraph 144 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 144 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 144 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

145. Lantower avers that the allegations of Paragraph 145 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 145 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 145 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

146. Lantower avers that the allegations of Paragraph 146 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 146 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 146 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

147. To the extent that the allegations of Paragraph 147 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 147 relate to Lantower, Lantower denies all of those allegations.

148. Lantower avers that the allegations of Paragraph 148 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 148 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 148 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

149. Lantower avers that the allegations of Paragraph 149 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 149 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 149 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

150. To the extent that the allegations of Paragraph 150 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 150 relate to Lantower, Lantower denies all of those allegations.

151. Lantower avers that the allegations of Paragraph 151 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 151 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 151 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

152. Lantower avers that the allegations of Paragraph 152 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 152 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 152 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

153. To the extent that the allegations of Paragraph 153 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 153 relate to Lantower, Lantower denies all of those allegations.

154. Lantower avers that the allegations of Paragraph 154 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 154 to the extent they purport to pertain to Lantower. Further, to the



extent that the allegations of Paragraph 154 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

155. Lantower avers that the allegations of Paragraph 155 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 155 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 155 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

156. To the extent that the allegations of Paragraph 156 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 156 relate to Lantower, Lantower denies all of those allegations.

157. Lantower avers that the allegations of Paragraph 157 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 157 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 157 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

158. Lantower avers that the allegations of Paragraph 158 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 158 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 158 relate to other defendants or other persons, Lantower

lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

159. To the extent that the allegations of Paragraph 159 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 159 relate to Lantower, Lantower denies all of those allegations.

160. Lantower avers that the allegations of Paragraph 160 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 160 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 160 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

161. Lantower avers that the allegations of Paragraph 161 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 161 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 161 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

162. To the extent that the allegations of Paragraph 162 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 162 relate to Lantower, Lantower denies all of those allegations.

163. Lantower avers that the allegations of Paragraph 163 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 163 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 163 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

164. Lantower avers that the allegations of Paragraph 164 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 164 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 164 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

165. To the extent that the allegations of Paragraph 165 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 165 relate to Lantower, Lantower denies all of those allegations.

166. Lantower avers that the allegations of Paragraph 166 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 166 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 166 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

167. Lantower avers that the allegations of Paragraph 167 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 167 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 167 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

168. To the extent that the allegations of Paragraph 168 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 168 relate to Lantower, Lantower denies all of those allegations.

169. Lantower avers that the allegations of Paragraph 169 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 169 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 169 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

170. Lantower avers that the allegations of Paragraph 170 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 170 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 170 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

171. To the extent that the allegations of Paragraph 171 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 171 relate to Lantower, Lantower denies all of those allegations.

172. Lantower avers that the allegations of Paragraph 172 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 172 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 172 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

173. Lantower avers that the allegations of Paragraph 173 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 173 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 173 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

174. To the extent that the allegations of Paragraph 174 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 174 relate to Lantower, Lantower denies all of those allegations.

175. Lantower avers that the allegations of Paragraph 175 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 175 to the extent they purport to pertain to Lantower. Further, to the

extent that the allegations of Paragraph 175 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

176. Lantower avers that the allegations of Paragraph 176 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 176 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 176 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

177. To the extent that the allegations of Paragraph 177 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 177 relate to Lantower, Lantower denies all of those allegations.

178. Lantower avers that the allegations of Paragraph 178 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 178 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 178 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

179. Lantower avers that the allegations of Paragraph 179 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 179 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 179 relate to other defendants or other persons, Lantower

lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

180. To the extent that the allegations of Paragraph 180 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 180 relate to Lantower, Lantower denies all of those allegations.

181. Lantower avers that the allegations of Paragraph 181 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 181 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 181 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

182. To the extent that the allegations of Paragraph 182 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 182 relate to Lantower, Lantower denies all of those allegations.

183. Lantower avers that the allegations of Paragraph 183 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 183 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 183 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

184. Lantower avers that the allegations of Paragraph 184 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 184 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 184 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

185. To the extent that the allegations of Paragraph 185 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 185 relate to Lantower, Lantower denies all of those allegations.

186. Lantower avers that the allegations of Paragraph 186 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 186 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 186 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

187. To the extent that the allegations of Paragraph 187 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 187 relate to Lantower, Lantower denies all of those allegations.

188. Lantower avers that the allegations of Paragraph 188 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 188 to the extent they purport to pertain to Lantower. Further, to the



extent that the allegations of Paragraph 188 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

189. To the extent that the allegations of Paragraph 189 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 189 relate to Lantower, Lantower denies all of those allegations.

190. Lantower avers that the allegations of Paragraph 190 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 190 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 190 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

191. Lantower avers that the allegations of Paragraph 191 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 191 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 191 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

192. To the extent that the allegations of Paragraph 192 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 192 relate to Lantower, Lantower denies all of those allegations.

193. Lantower avers that the allegations of Paragraph 193 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 193 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 193 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

194. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 194, and therefore denies them.

195. Lantower avers that the allegations of Paragraph 195 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 195 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 195 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

196. Lantower admits that Paragraph 196 purports to define acts and deeds as set forth in the SAC, but otherwise denies the propriety of the definition provided or any inference arising therefrom.

197. To the extent that the allegations of Paragraph 197 are definitional, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 197, and therefore denies them.

198. To the extent that the allegations of Paragraph 198 are definitional, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or

information sufficient to form a belief as to the truth of the allegations of Paragraph 198, and therefore denies them.

199. To the extent that the allegations of Paragraph 199 are definitional, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 199, and therefore denies them.

200. Lantower avers that the allegations of Paragraph 200 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 200 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 200 relate to other defendants, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

201. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201, and therefore denies them.

## **V. Allegations Concerning Purported Facts**

202. To the extent that the allegations of Paragraph 202 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 202 relate to Lantower, Lantower denies all of those allegations.

203. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203, and therefore denies them.

204. To the extent that the allegations of Paragraph 204 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth,

and therefore denies them. To the extent that the allegations of Paragraph 204 relate to Lantower, Lantower denies all of those allegations.

205. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 205, and therefore denies them.

206. Lantower avers that the allegations of Paragraph 206 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 206 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 206 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

207. Lantower avers that the allegations of Paragraph 207 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 207 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 207 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

208. Lantower avers that the allegations of Paragraph 208 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 208 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 208 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

209. To the extent that the allegations of Paragraph 209 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 209 relate to Lantower, Lantower denies all of those allegations.

210. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 210, and therefore denies them.

211. Lantower avers that the allegations of Paragraph 211 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 211 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 211 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

212. To the extent that the allegations of Paragraph 212 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 212 relate to Lantower, Lantower denies all of those allegations.

213. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 213, and therefore denies them.

214. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 214, and therefore denies them.

215. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 215, and therefore denies them.

216. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216, and therefore denies them.

217. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 217, and therefore denies them.

218. Lantower avers that the allegations of Paragraph 218 constitute legal contentions and/or conclusions to which no response is required. To the extent a response is required to the allegations of Paragraph 218, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

219. Lantower avers that the allegations of Paragraph 219 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 219 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 219 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

220. Lantower avers that the allegations of Paragraph 220 constitute legal contentions and/or conclusions to which no response is required. To the extent a response is required to the allegations of Paragraph 220, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

221. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 221, and therefore denies them.

222. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 222, and therefore denies them.

223. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 223, and therefore denies them.

224. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 224, and therefore denies them.

225. To the extent that the allegations of Paragraph 225 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 225 relate to Lantower, Lantower denies all of those allegations.

226. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 226, and therefore denies them.

227. To the extent that the allegations of Paragraph 227 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 227 relate to Lantower, Lantower denies all of those allegations.

228. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 228, and therefore denies them.

229. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 229, and therefore denies them.

230. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230, and therefore denies them.

231. To the extent that the allegations of Paragraph 231 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth,

and therefore denies them. To the extent that the allegations of Paragraph 231 relate to Lantower, Lantower denies all of those allegations.

232. To the extent that the allegations of Paragraph 232 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 232 relate to Lantower, Lantower denies all of those allegations.

233. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 233, and therefore denies them.

234. To the extent that the allegations of Paragraph 234 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 234 relate to Lantower, Lantower denies all of those allegations.

235. To the extent that the allegations of Paragraph 235 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 235 relate to Lantower, Lantower denies all of those allegations.

236. Lantower avers that the allegations of Paragraph 236 constitute legal contentions and/or conclusions to which no response is required. To the extent a response is required to the allegations of Paragraph 236, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

237. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 237, and therefore denies them.



238. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238, and therefore denies them.

239. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239, and therefore denies them.

240. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 240, and therefore denies them.

241. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 241, and therefore denies them.

242. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 242, and therefore denies them.

243. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 243, and therefore denies them.

244. To the extent that the allegations of Paragraph 244 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 244 relate to Lantower, Lantower denies all of those allegations.

245. To the extent that the allegations of Paragraph 245 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 245 relate to Lantower, Lantower denies all of those allegations.

246. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246, and therefore denies them.

247. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 247, and therefore denies them.

248. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 248, and therefore denies them.

249. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 249, and therefore denies them.

250. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 250, and therefore denies them.

251. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 251, and therefore denies them.

252. To the extent that the allegations of Paragraph 252 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 252 relate to Lantower, Lantower denies all of those allegations.

253. To the extent that the allegations of Paragraph 253 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 253 relate to Lantower, Lantower denies all of those allegations.

254. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 254, and therefore denies them.

255. To the extent that the allegations of Paragraph 255 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth,

and therefore denies them. To the extent that the allegations of Paragraph 255 relate to Lantower, Lantower denies all of those allegations.

256. To the extent that the allegations of Paragraph 256 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 256 relate to Lantower, Lantower denies all of those allegations.

257. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 257, and therefore denies them.

258. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 258, and therefore denies them.

259. To the extent that the allegations of Paragraph 259 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 259 relate to Lantower, Lantower denies all of those allegations.

260. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 260, and therefore denies them.

261. To the extent that the allegations of Paragraph 261 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 261 relate to Lantower, Lantower denies all of those allegations.

262. To the extent that the allegations of Paragraph 262 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth,

and therefore denies them. To the extent that the allegations of Paragraph 262 relate to Lantower, Lantower denies all of those allegations.

263. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 263, and therefore denies them.

264. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 264, and therefore denies them.

265. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 265, and therefore denies them.

266. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 266, and therefore denies them.

267. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 267, and therefore denies them.

268. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 268, and therefore denies them.

269. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 269, and therefore denies them.

270. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 270, and therefore denies them.

271. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 271, and therefore denies them.

272. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 272, and therefore denies them.

273. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273, and therefore denies them.

274. To the extent that the allegations of Paragraph 274 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 274 relate to Lantower, Lantower denies all of those allegations.

275. To the extent that the allegations of Paragraph 275 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 275 relate to Lantower, Lantower denies all of those allegations.

276. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276, and therefore denies them.

277. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 277, and therefore denies them.

278. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 278, and therefore denies them.

279. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 279, and therefore denies them.

280. To the extent that the allegations of Paragraph 280 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 280 relate to Lantower, Lantower denies all of those allegations.

281. To the extent that the allegations of Paragraph 281 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 281 relate to Lantower, Lantower denies all of those allegations.

282. To the extent that the allegations of Paragraph 282 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 282 relate to Lantower, Lantower denies all of those allegations.

283. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283, and therefore denies them.

284. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284, and therefore denies them.

285. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 285, and therefore denies them.

286. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286, and therefore denies them.

287. Lantower avers that the allegations of Paragraph 287 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 287 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 287 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

288. To the extent that the allegations of Paragraph 288 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 288 relate to Lantower, Lantower denies all of those allegations.

289. To the extent that the allegations of Paragraph 289 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 289 relate to Lantower, Lantower denies all of those allegations.

290. To the extent that the allegations of Paragraph 290 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 290 relate to Lantower, Lantower denies all of those allegations.

291. To the extent that the allegations of Paragraph 291 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 291 relate to Lantower, Lantower denies all of those allegations.

292. Lantower avers that the allegations of Paragraph 292 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 292 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 292 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

293. To the extent that the allegations of Paragraph 293 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 293 relate to Lantower, Lantower denies all of those allegations.

294. To the extent that the allegations of Paragraph 294 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 294 relate to Lantower, Lantower denies all of those allegations.

295. To the extent that the allegations of Paragraph 295 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 295 relate to Lantower, Lantower denies all of those allegations.

296. To the extent that the allegations of Paragraph 296 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 296 relate to Lantower, Lantower denies all of those allegations.

297. To the extent that the allegations of Paragraph 297 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 297 relate to Lantower, Lantower denies all of those allegations.

298. To the extent that the allegations of Paragraph 298 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth,



and therefore denies them. To the extent that the allegations of Paragraph 298 relate to Lantower, Lantower denies all of those allegations.

299. To the extent that the allegations of Paragraph 299 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 299 relate to Lantower, Lantower denies all of those allegations.

300. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 300, and therefore denies them.

301. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 301, and therefore denies them.

302. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 302, and therefore denies them.

303. To the extent that the allegations of Paragraph 303 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 303 relate to Lantower, Lantower denies all of those allegations.

304. Lantower avers that the allegations of Paragraph 304 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 304 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 304 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

305. Lantower avers that the allegations of Paragraph 305 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 305 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 305 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

306. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 306, and therefore denies them.

307. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 307, and therefore denies them.

308. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 308, and therefore denies them.

309. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 309, and therefore denies them.

310. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 310, and therefore denies them.

311. To the extent that the allegations of Paragraph 311 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 311 relate to Lantower, Lantower denies all of those allegations.

312. To the extent that the allegations of Paragraph 312 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth,

and therefore denies them. To the extent that the allegations of Paragraph 312 relate to Lantower, Lantower denies all of those allegations.

313. Lantower avers that the allegations of Paragraph 313 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 313 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 313 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

314. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314, and therefore denies them.

315. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315, and therefore denies them.

316. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 316, and therefore denies them.

317. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 317, and therefore denies them.

318. To the extent that the allegations of Paragraph 318 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 318, and therefore denies them.

319. To the extent that the allegations of Paragraph 319 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 319, and therefore denies them.

320. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 320, and therefore denies them.

321. To the extent that the allegations of Paragraph 321 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 321, and therefore denies them.

322. To the extent that the allegations of Paragraph 322 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 322, and therefore denies them.

323. To the extent that the allegations of Paragraph 323 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 323, and therefore denies them.

324. To the extent that the allegations of Paragraph 324 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 324, and therefore denies them.

325. To the extent that the allegations of Paragraph 325 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 325, and therefore denies them.

326. To the extent that the allegations of Paragraph 326 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 326, and therefore denies them.

327. To the extent that the allegations of Paragraph 327 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 327, and therefore denies them.

328. To the extent that the allegations of Paragraph 328 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 328, and therefore denies them.

329. To the extent that the allegations of Paragraph 329 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 329, and therefore denies them.

330. To the extent that the allegations of Paragraph 330 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 330, and therefore denies them.

331. Lantower avers that the allegations of Paragraph 331 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 331 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 331 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

332. Lantower avers that the allegations of Paragraph 332 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 332 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 332 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

333. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 333, and therefore denies them.

334. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 334, and therefore denies them.

335. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 335, and therefore denies them.

336. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 336, and therefore denies them.

337. Lantower avers that the allegations of Paragraph 337 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 337 to the extent they purport to pertain to Lantower. Further, to the

extent that the allegations of Paragraph 337 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

338. To the extent that the allegations of Paragraph 338 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 338 relate to Lantower, Lantower denies all of those allegations.

339. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 339, and therefore denies them.

340. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 340, and therefore denies them.

341. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 341, and therefore denies them.

342. To the extent that the allegations of Paragraph 342 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 342 relate to Lantower, Lantower denies all of those allegations, with the exception of matters specifically admitted herein as follows. Lantower admits that it owns and manages certain properties in the Dallas area.

343. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 343, and therefore denies them.

344. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 344, and therefore denies them.

345. To the extent that the allegations of Paragraph 345 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent the allegations of Paragraph 345 relate to Lantower, Lantower denies all of those allegations, with the exception of matters specifically admitted herein as follows. Lantower admits that it owns and manages certain properties in the Miami area.

346. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 346, and therefore denies them.

347. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 347, and therefore denies them.

348. To the extent that the allegations of Paragraph 348 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 348 relate to Lantower, Lantower denies all of those allegations.

349. To the extent that the allegations of Paragraph 349 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 349 relate to Lantower, Lantower denies all of those allegations.

350. To the extent that the allegations of Paragraph 350 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 350 relate to Lantower, Lantower denies all of those allegations.

351. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 351, and therefore denies them.



352. To the extent that the allegations of Paragraph 352 are definitional, Lantower avers that no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 352 relate to other defendants or persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 352, with the exception of matters specifically admitted herein as follows. Lantower admits that Plaintiffs in the SAC purport to refer to purported rental housing markets in Atlanta, Phoenix, Orlando, and Dallas collectively as the “Regression Submarkets,” although Lantower disputes the propriety of such definitions and any inferences arising therefrom.

353. To the extent that the allegations of Paragraph 353 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 353 relate to Lantower, Lantower denies all of those allegations.

354. To the extent that the allegations of Paragraph 354 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 354 relate to Lantower, Lantower denies all of those allegations.

355. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 355, and therefore denies them.

356. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 356, and therefore denies them.

357. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 357, and therefore denies them.

358. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 358, and therefore denies them.

359. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 359, and therefore denies them.

360. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 360, and therefore denies them.

361. To the extent that the allegations of Paragraph 361 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 361 relate to Lantower, Lantower denies all of those allegations.

362. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 362, and therefore denies them.

363. To the extent that the allegations of Paragraph 363 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 363 relate to Lantower, Lantower denies all of those allegations.

364. To the extent that the allegations of Paragraph 364 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 364 relate to Lantower, Lantower denies all of those allegations.

365. Lantower avers that the allegations of Paragraph 365 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 365 to the extent they purport to pertain to Lantower. Further, to the

extent that the allegations of Paragraph 365 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

366. Lantower avers that the allegations of Paragraph 366 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 366 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 366 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

367. Lantower avers that the allegations of Paragraph 367 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 367 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 367 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

368. Lantower avers that the allegations of Paragraph 368 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 368 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 368 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

369. To the extent that the allegations of Paragraph 369 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 369, and therefore denies them.

370. To the extent that the allegations of Paragraph 370 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 370, and therefore denies them.

371. Lantower avers that the allegations of Paragraph 371 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 371 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 371 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

372. Lantower avers that the allegations of Paragraph 372 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 372 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 372 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

373. To the extent that the allegations of Paragraph 373 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 373 relate to Lantower, Lantower denies all of those allegations.

374. Lantower avers that the allegations of Paragraph 374 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 374 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 374 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

375. Lantower avers that the allegations of Paragraph 375 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 375 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 375 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

376. Lantower avers that the allegations of Paragraph 376 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 376 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 376 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

377. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 377, and therefore denies them.

378. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 378, and therefore denies them.

379. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 379, and therefore denies them.

380. Lantower avers that the allegations of Paragraph 380 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 380 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 380 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

381. Lantower avers that the allegations of Paragraph 381 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 381 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 381 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

382. Lantower avers that the allegations of Paragraph 382 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 382 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 382 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

383. Lantower avers that the allegations of Paragraph 383 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 383 to the extent they purport to pertain to Lantower. Further, to the

extent that the allegations of Paragraph 383 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

384. Lantower avers that the allegations of Paragraph 384 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 384 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 384 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

385. To the extent that the allegations of Paragraph 385 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 385 relate to Lantower, Lantower denies all of those allegations.

386. Lantower avers that the allegations of Paragraph 386 constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 386 relate to other defendants or persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 386, with the exception of matters specifically admitted herein as follows. Lantower admits that one or more of its employees has attended one or more events hosted by the National Multifamily Housing Council.

387. Lantower avers that the allegations of Paragraph 387 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the

allegations of Paragraph 387 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 387 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

388. To the extent that the allegations of Paragraph 388 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 388, and therefore denies them.

389. Lantower avers that the allegations of Paragraph 389 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 389 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 389 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

390. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 390, and therefore denies them.

391. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 391, and therefore denies them.

## **VI. Allegations Concerning the Purported Relevant Market**

392. Lantower avers that the allegations of Paragraph 392 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 392 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 392 relate to other defendants or other persons, Lantower



lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

393. Lantower avers that the allegations of Paragraph 393 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 393 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 393 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

394. Lantower avers that the allegations of Paragraph 394 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 394 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 394 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

395. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 395, and therefore denies them.

396. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 396, and therefore denies them.

397. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 397, and therefore denies them.

398. Lantower avers that the allegations of Paragraph 398 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 398 to the extent they purport to pertain to Lantower. Further, to the

extent that the allegations of Paragraph 398 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

399. Lantower avers that the allegations of Paragraph 399 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 399 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 399 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

400. Lantower avers that the allegations of Paragraph 400 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 400 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 400 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

401. Lantower avers that the allegations of Paragraph 401 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 401 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 401 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

402. Lantower avers that the allegations of Paragraph 402 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the

allegations of Paragraph 402 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 402 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

403. Lantower avers that the allegations of Paragraph 403 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 403 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 403 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

404. Lantower avers that the allegations of Paragraph 404 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 404 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 404 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

405. Lantower avers that the allegations of Paragraph 405 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 405 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 405 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

406. Lantower avers that the allegations of Paragraph 406 constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 406 relate to other defendants, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 406, with the exception of matters specifically admitted herein as follows. Lantower admits that it owns and/or operates certain properties in multiple U.S. cities.

407. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 407, and therefore denies them.

408. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 408, and therefore denies them.

409. Lantower avers that the allegations of Paragraph 409 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 409 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 409 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

410. To the extent that the allegations of Paragraph 410 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 410, and therefore denies them.

411. To the extent that the allegations of Paragraph 411 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 411, and therefore denies them.

412. To the extent that the allegations of Paragraph 412 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 412, and therefore denies them.

413. To the extent that the allegations of Paragraph 413 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 413, and therefore denies them.

414. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 414, and therefore denies them.

415. To the extent that the allegations of Paragraph 415 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 415, and therefore denies them.

416. To the extent that the allegations of Paragraph 416 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 416, and therefore denies them.

417. To the extent that the allegations of Paragraph 417 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 417, and therefore denies them.

418. To the extent that the allegations of Paragraph 418 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 418, and therefore denies them.

419. To the extent that the allegations of Paragraph 419 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 419, and therefore denies them.

420. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 420, and therefore denies them.

421. To the extent that the allegations of Paragraph 421 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 421, and therefore denies them.

422. To the extent that the allegations of Paragraph 422 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 422, and therefore denies them.

423. To the extent that the allegations of Paragraph 423 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 423, and therefore denies them.

424. To the extent that the allegations of Paragraph 424 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 424, and therefore denies them.

425. Lantower avers that the allegations of Paragraph 425 constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 425 relate to other defendants, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 425, with the exception of matters specifically admitted herein as follows. Lantower admits that it owns and operates certain properties in Pflugerville and Red Rock, Texas for which it has utilized the YieldStar product.

426. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 426, and therefore denies them.

427. Lantower avers that the allegations of Paragraph 427 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 427 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 427 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

428. To the extent that the allegations of Paragraph 428 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 428, and therefore denies them.

429. To the extent that the allegations of Paragraph 429 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 429, and therefore denies them.

430. To the extent that the allegations of Paragraph 430 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 430, and therefore denies them.

431. To the extent that the allegations of Paragraph 431 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 431, and therefore denies them.

432. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 432, and therefore denies them.

433. To the extent that the allegations of Paragraph 433 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 433, and therefore denies them.



434. To the extent that the allegations of Paragraph 434 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 434, and therefore denies them.

435. To the extent that the allegations of Paragraph 435 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 435, and therefore denies them.

436. To the extent that the allegations of Paragraph 436 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 436, and therefore denies them.

437. To the extent that the allegations of Paragraph 437 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 437, and therefore denies them.

438. To the extent that the allegations of Paragraph 438 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 438, and therefore denies them.

439. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 439, and therefore denies them.

440. To the extent that the allegations of Paragraph 440 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 440, and therefore denies them.

441. To the extent that the allegations of Paragraph 441 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 441, and therefore denies them.

442. To the extent that the allegations of Paragraph 442 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 442, and therefore denies them.

443. To the extent that the allegations of Paragraph 443 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 443, and therefore denies them.

444. To the extent that the allegations of Paragraph 444 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 444, and therefore denies them.

445. Lantower avers that the allegations of Paragraph 445 constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 445 relate to other defendants, Lantower lacks

knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 445, with the exception of matters specifically admitted herein as follows. Lantower admits that it that it owns and operates certain properties in Charlotte, North Carolina for which it has utilized the YieldStar product.

446. Lantower avers that the allegations of Paragraph 446 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 446 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 446 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

447. Lantower avers that the allegations of Paragraph 447 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 447 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 447 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

448. To the extent that the allegations of Paragraph 448 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 448, and therefore denies them.

449. To the extent that the allegations of Paragraph 449 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 449, and therefore denies them.

450. To the extent that the allegations of Paragraph 450 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 450, and therefore denies them.

451. To the extent that the allegations of Paragraph 451 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 451, and therefore denies them.

452. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 452, and therefore denies them.

453. To the extent that the allegations of Paragraph 453 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 453, and therefore denies them.

454. To the extent that the allegations of Paragraph 454 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 454, and therefore denies them.

455. To the extent that the allegations of Paragraph 455 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 455, and therefore denies them.

456. To the extent that the allegations of Paragraph 456 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 456, and therefore denies them.

457. Lantower avers that the allegations of Paragraph 457 constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 457 relate to other defendants, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 457, with the exception of matters specifically admitted herein as follows. Lantower admits that it owns and/or operates certain properties in Carrollton, Dallas, Fairview and Lewisville, Texas for which it has utilized the YieldStar product.

458. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458, and therefore denies them.

459. Lantower avers that the allegations of Paragraph 459 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 459 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 459 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

460. To the extent that the allegations of Paragraph 460 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 460, and therefore denies them.

461. To the extent that the allegations of Paragraph 461 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 461, and therefore denies them.

462. To the extent that the allegations of Paragraph 462 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 462, and therefore denies them.

463. To the extent that the allegations of Paragraph 463 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 463, and therefore denies them.

464. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464, and therefore denies them.

465. To the extent that the allegations of Paragraph 465 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 465, and therefore denies them.

466. To the extent that the allegations of Paragraph 466 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 466, and therefore denies them.

467. To the extent that the allegations of Paragraph 467 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 467, and therefore denies them.

468. To the extent that the allegations of Paragraph 468 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 468, and therefore denies them.

469. To the extent that the allegations of Paragraph 469 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 469, and therefore denies them.

470. To the extent that the allegations of Paragraph 470 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 470, and therefore denies them.

471. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 471, and therefore denies them.

472. To the extent that the allegations of Paragraph 472 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 472, and therefore denies them.

473. To the extent that the allegations of Paragraph 473 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 473, and therefore denies them.

474. To the extent that the allegations of Paragraph 474 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 474, and therefore denies them.

475. To the extent that the allegations of Paragraph 475 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 475, and therefore denies them.

476. To the extent that the allegations of Paragraph 476 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 476, and therefore denies them.

477. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 477, and therefore denies them.



478. To the extent that the allegations of Paragraph 478 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 478, and therefore denies them.

479. To the extent that the allegations of Paragraph 479 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 479, and therefore denies them.

480. To the extent that the allegations of Paragraph 480 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 480, and therefore denies them.

481. To the extent that the allegations of Paragraph 481 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 481, and therefore denies them.

482. To the extent that the allegations of Paragraph 482 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 482, and therefore denies them.

483. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 483, and therefore denies them.

484. To the extent that the allegations of Paragraph 484 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 484, and therefore denies them.

485. To the extent that the allegations of Paragraph 485 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 485, and therefore denies them.

486. To the extent that the allegations of Paragraph 486 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 486, and therefore denies them.

487. To the extent that the allegations of Paragraph 487 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 487, and therefore denies them.

488. To the extent that the allegations of Paragraph 488 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 488, and therefore denies them.

489. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 489, and therefore denies them.

490. To the extent that the allegations of Paragraph 490 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 490, and therefore denies them.

491. To the extent that the allegations of Paragraph 491 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 491, and therefore denies them.

492. To the extent that the allegations of Paragraph 492 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 492, and therefore denies them.

493. To the extent that the allegations of Paragraph 493 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 493, and therefore denies them.

494. To the extent that the allegations of Paragraph 494 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 494, and therefore denies them.

495. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 495, and therefore denies them.

496. To the extent that the allegations of Paragraph 496 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 496, and therefore denies them.

497. To the extent that the allegations of Paragraph 497 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 497, and therefore denies them.

498. To the extent that the allegations of Paragraph 498 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 498, and therefore denies them.

499. To the extent that the allegations of Paragraph 499 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 499, and therefore denies them.

500. To the extent that the allegations of Paragraph 500 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 500, and therefore denies them.

501. To the extent that the allegations of Paragraph 501 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 501, and therefore denies them.

502. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 502, and therefore denies them.

503. To the extent that the allegations of Paragraph 503 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 503, and therefore denies them.

504. To the extent that the allegations of Paragraph 504 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 504, and therefore denies them.

505. To the extent that the allegations of Paragraph 505 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 505, and therefore denies them.

506. To the extent that the allegations of Paragraph 506 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 506, and therefore denies them.

507. Lantower avers that the allegations of Paragraph 507 constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 507 relate to other defendants, Lantower lacks

knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 507, with the exception of matters specifically admitted herein as follows. Lantower admits that it owns and operates a property in Miami, Florida for which it has utilized the YieldStar product.

508. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 508, and therefore denies them.

509. Lantower avers that the allegations of Paragraph 509 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 509 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 509 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

510. To the extent that the allegations of Paragraph 510 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 510, and therefore denies them.

511. To the extent that the allegations of Paragraph 511 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 511, and therefore denies them.

512. To the extent that the allegations of Paragraph 512 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 512, and therefore denies them.

513. To the extent that the allegations of Paragraph 513 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 513, and therefore denies them.

514. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 514, and therefore denies them.

515. To the extent that the allegations of Paragraph 515 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 515, and therefore denies them.

516. To the extent that the allegations of Paragraph 516 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 516, and therefore denies them.

517. To the extent that the allegations of Paragraph 517 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 517, and therefore denies them.

518. To the extent that the allegations of Paragraph 518 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 518, and therefore denies them.

519. To the extent that the allegations of Paragraph 519 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 519, and therefore denies them.

520. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 520, and therefore denies them.

521. To the extent that the allegations of Paragraph 521 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 521, and therefore denies them.

522. To the extent that the allegations of Paragraph 522 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 522, and therefore denies them.

523. To the extent that the allegations of Paragraph 523 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 523, and therefore denies them.

524. To the extent that the allegations of Paragraph 524 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,



Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 524, and therefore denies them.

525. To the extent that the allegations of Paragraph 525 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 525, and therefore denies them.

526. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 526, and therefore denies them.

527. To the extent that the allegations of Paragraph 527 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 527, and therefore denies them.

528. To the extent that the allegations of Paragraph 528 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 528, and therefore denies them.

529. To the extent that the allegations of Paragraph 529 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 529, and therefore denies them.

530. To the extent that the allegations of Paragraph 530 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 530, and therefore denies them.

531. To the extent that the allegations of Paragraph 531 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 531, and therefore denies them.

532. Lantower avers that the allegations of Paragraph 532 constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 532 relate to other defendants, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 532, with the exception of matters specifically admitted herein as follows. Lantower admits that it owns and operates certain properties in Orlando, Florida for which it has utilized the YieldStar product.

533. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 533, and therefore denies them.

534. Lantower avers that the allegations of Paragraph 534 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 534 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 534 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

535. To the extent that the allegations of Paragraph 535 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 535, and therefore denies them.

536. To the extent that the allegations of Paragraph 536 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 536, and therefore denies them.

537. To the extent that the allegations of Paragraph 537 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 537, and therefore denies them.

538. To the extent that the allegations of Paragraph 538 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 538, and therefore denies them.

539. To the extent that the allegations of Paragraph 539 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 539, and therefore denies them.

540. To the extent that the allegations of Paragraph 540 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 540, and therefore denies them.

541. To the extent that the allegations of Paragraph 541 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 541, and therefore denies them.

542. To the extent that the allegations of Paragraph 542 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 542, and therefore denies them.

543. To the extent that the allegations of Paragraph 543 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 543, and therefore denies them.

544. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 544, and therefore denies them.

545. To the extent that the allegations of Paragraph 545 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 545, and therefore denies them.

546. To the extent that the allegations of Paragraph 546 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 546, and therefore denies them.

547. To the extent that the allegations of Paragraph 547 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 547, and therefore denies them.

548. To the extent that the allegations of Paragraph 548 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 548, and therefore denies them.

549. To the extent that the allegations of Paragraph 549 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 549, and therefore denies them.

550. To the extent that the allegations of Paragraph 550 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 550, and therefore denies them.

551. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 551, and therefore denies them.

552. To the extent that the allegations of Paragraph 552 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 552, and therefore denies them.

553. To the extent that the allegations of Paragraph 553 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 553, and therefore denies them.

554. To the extent that the allegations of Paragraph 554 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 554, and therefore denies them.

555. To the extent that the allegations of Paragraph 555 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 555, and therefore denies them.

556. To the extent that the allegations of Paragraph 556 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 556, and therefore denies them.

557. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 557, and therefore denies them.

558. To the extent that the allegations of Paragraph 558 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 558, and therefore denies them.

559. To the extent that the allegations of Paragraph 559 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 559, and therefore denies them.

560. To the extent that the allegations of Paragraph 560 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 560, and therefore denies them.

561. To the extent that the allegations of Paragraph 561 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 561, and therefore denies them.

562. To the extent that the allegations of Paragraph 562 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 562, and therefore denies them.

563. To the extent that the allegations of Paragraph 563 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 563, and therefore denies them.

564. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 564, and therefore denies them.

565. To the extent that the allegations of Paragraph 565 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 565, and therefore denies them.

566. To the extent that the allegations of Paragraph 566 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 566, and therefore denies them.

567. To the extent that the allegations of Paragraph 567 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 567, and therefore denies them.

568. To the extent that the allegations of Paragraph 568 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 568, and therefore denies them.

569. To the extent that the allegations of Paragraph 569 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 569, and therefore denies them.



570. To the extent that the allegations of Paragraph 570 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 570, and therefore denies them.

571. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 571, and therefore denies them.

572. To the extent that the allegations of Paragraph 572 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 572, and therefore denies them.

573. To the extent that the allegations of Paragraph 573 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 573, and therefore denies them.

574. To the extent that the allegations of Paragraph 574 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks 574 or information sufficient to form a belief as to the truth of the allegations of Paragraph 560, and therefore denies them.

575. To the extent that the allegations of Paragraph 575 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 575, and therefore denies them.

576. To the extent that the allegations of Paragraph 576 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 576, and therefore denies them.

577. To the extent that the allegations of Paragraph 577 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 577, and therefore denies them.

578. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 578, and therefore denies them.

579. To the extent that the allegations of Paragraph 579 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 579, and therefore denies them.

580. To the extent that the allegations of Paragraph 580 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 580, and therefore denies them.

581. To the extent that the allegations of Paragraph 581 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 581, and therefore denies them.

582. To the extent that the allegations of Paragraph 582 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 582, and therefore denies them.

583. To the extent that the allegations of Paragraph 583 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 583, and therefore denies them.

584. To the extent that the allegations of Paragraph 584 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 584, and therefore denies them.

585. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 585, and therefore denies them.

586. To the extent that the allegations of Paragraph 586 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 586, and therefore denies them.

587. To the extent that the allegations of Paragraph 587 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 587, and therefore denies them.

588. To the extent that the allegations of Paragraph 588 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 588, and therefore denies them.

589. To the extent that the allegations of Paragraph 589 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 589, and therefore denies them.

590. To the extent that the allegations of Paragraph 590 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 590, and therefore denies them.

591. To the extent that the allegations of Paragraph 591 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 591, and therefore denies them.

592. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 592, and therefore denies them.

593. To the extent that the allegations of Paragraph 593 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 593, and therefore denies them.

594. To the extent that the allegations of Paragraph 594 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 594, and therefore denies them.

595. To the extent that the allegations of Paragraph 595 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 595, and therefore denies them.

596. To the extent that the allegations of Paragraph 596 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 596, and therefore denies them.

597. Lantower avers that the allegations of Paragraph 597 constitute legal contentions and/or conclusions to which no response is required. To the extent that a response is required and to the extent that the allegations of Paragraph 597 relate to other defendants, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that a response is required as to matters relating to Lantower, Lantower denies all of the allegations of Paragraph 597, with the exception of matters specifically admitted herein as follows. Lantower admits that it owns and operates certain properties in Lutz, Odessa, and Tampa, Florida for which it has utilized the YieldStar product.

598. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 598, and therefore denies them.

599. Lantower avers that the allegations of Paragraph 599 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 599 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 599 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

600. To the extent that the allegations of Paragraph 600 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 600, and therefore denies them.

601. To the extent that the allegations of Paragraph 601 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 601, and therefore denies them.

602. To the extent that the allegations of Paragraph 602 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 602, and therefore denies them.

603. To the extent that the allegations of Paragraph 603 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 603, and therefore denies them.

604. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604, and therefore denies them.

605. To the extent that the allegations of Paragraph 605 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 605, and therefore denies them.

606. To the extent that the allegations of Paragraph 606 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 606, and therefore denies them.

607. To the extent that the allegations of Paragraph 607 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 607, and therefore denies them.

608. To the extent that the allegations of Paragraph 608 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 608, and therefore denies them.

609. To the extent that the allegations of Paragraph 609 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 609, and therefore denies them.

610. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 610, and therefore denies them.

611. To the extent that the allegations of Paragraph 611 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 611, and therefore denies them.

612. To the extent that the allegations of Paragraph 612 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 612, and therefore denies them.

613. To the extent that the allegations of Paragraph 613 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 613, and therefore denies them.

614. To the extent that the allegations of Paragraph 614 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 614, and therefore denies them.

615. To the extent that the allegations of Paragraph 615 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 615, and therefore denies them.



616. To the extent that the allegations of Paragraph 616 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 616, and therefore denies them.

617. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 617, and therefore denies them.

618. To the extent that the allegations of Paragraph 618 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 618, and therefore denies them.

619. To the extent that the allegations of Paragraph 619 are legal contentions or conclusions, Lantower avers that no response is required. If a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 619 to the extent they pertain to other defendants or persons, and therefore denies them. Further, Lantower denies all of the allegations of Paragraph 619 to the extent they purport to pertain to Lantower.

620. To the extent that the allegations of Paragraph 620 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 620, and therefore denies them.

621. To the extent that the allegations of Paragraph 621 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 621, and therefore denies them.

622. To the extent that the allegations of Paragraph 622 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 622, and therefore denies them.

623. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 623, and therefore denies them.

624. To the extent that the allegations of Paragraph 624 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 624, and therefore denies them.

625. To the extent that the allegations of Paragraph 625 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 625, and therefore denies them.

626. To the extent that the allegations of Paragraph 626 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 626, and therefore denies them.

627. To the extent that the allegations of Paragraph 627 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 627, and therefore denies them.

628. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 628, and therefore denies them.

629. To the extent that the allegations of Paragraph 629 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 629, and therefore denies them.

630. To the extent that the allegations of Paragraph 630 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 630, and therefore denies them.

631. To the extent that the allegations of Paragraph 631 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 631, and therefore denies them.

632. To the extent that the allegations of Paragraph 632 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 632, and therefore denies them.

633. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 633, and therefore denies them.

634. To the extent that the allegations of Paragraph 634 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 634, and therefore denies them.

635. To the extent that the allegations of Paragraph 635 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 635, and therefore denies them.

636. To the extent that the allegations of Paragraph 636 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 636, and therefore denies them.

637. To the extent that the allegations of Paragraph 637 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 637, and therefore denies them.

638. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 638, and therefore denies them.

639. To the extent that the allegations of Paragraph 639 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 639, and therefore denies them.

640. To the extent that the allegations of Paragraph 640 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 640, and therefore denies them.

641. To the extent that the allegations of Paragraph 641 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 641, and therefore denies them.

642. To the extent that the allegations of Paragraph 642 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 642, and therefore denies them.

643. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 643, and therefore denies them.

644. To the extent that the allegations of Paragraph 644 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 644, and therefore denies them.

645. To the extent that the allegations of Paragraph 645 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 645, and therefore denies them.

646. To the extent that the allegations of Paragraph 646 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 646, and therefore denies them.

647. To the extent that the allegations of Paragraph 647 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 647, and therefore denies them.

648. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 648, and therefore denies them.

649. To the extent that the allegations of Paragraph 649 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 649, and therefore denies them.

650. To the extent that the allegations of Paragraph 650 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 650, and therefore denies them.

651. To the extent that the allegations of Paragraph 651 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 651, and therefore denies them.

652. To the extent that the allegations of Paragraph 652 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 652, and therefore denies them.

653. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 653, and therefore denies them.

654. To the extent that the allegations of Paragraph 654 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 654, and therefore denies them.

655. To the extent that the allegations of Paragraph 655 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 655, and therefore denies them.

656. To the extent that the allegations of Paragraph 656 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 656, and therefore denies them.

657. To the extent that the allegations of Paragraph 657 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 657, and therefore denies them.

658. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 658, and therefore denies them.

659. To the extent that the allegations of Paragraph 659 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 659, and therefore denies them.

660. To the extent that the allegations of Paragraph 660 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 660, and therefore denies them.

661. To the extent that the allegations of Paragraph 661 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 661, and therefore denies them.

662. To the extent that the allegations of Paragraph 662 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 662, and therefore denies them.

663. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 663, and therefore denies them.

664. To the extent that the allegations of Paragraph 664 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,



Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 664, and therefore denies them.

665. To the extent that the allegations of Paragraph 665 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 665, and therefore denies them.

666. To the extent that the allegations of Paragraph 666 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 666, and therefore denies them.

667. To the extent that the allegations of Paragraph 667 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 667, and therefore denies them.

668. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 668, and therefore denies them.

669. To the extent that the allegations of Paragraph 669 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 669, and therefore denies them.

670. To the extent that the allegations of Paragraph 670 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required,

Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 670, and therefore denies them.

671. To the extent that the allegations of Paragraph 671 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 671, and therefore denies them.

672. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 672, and therefore denies them.

673. To the extent that the allegations of Paragraph 673 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 673, and therefore denies them.

674. To the extent that the allegations of Paragraph 674 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 674, and therefore denies them.

675. To the extent that the allegations of Paragraph 675 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 675, and therefore denies them.

676. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 676, and therefore denies them.

677. To the extent that the allegations of Paragraph 677 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 677, and therefore denies them.

678. Lantower avers that the allegations of Paragraph 678 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 678 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 678 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

679. To the extent that the allegations of Paragraph 679 are legal contentions or conclusions, Lantower avers that no response is required. To the extent a response is required, Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 679, and therefore denies them.

680. Lantower avers that the allegations of Paragraph 680 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of the allegations of Paragraph 680 to the extent they purport to pertain to Lantower. Further, to the extent that the allegations of Paragraph 680 relate to other defendants or other persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them.

## **VII. Class Action Allegations**

681. Lantower denies all of the allegations of paragraph 681, with the exception of matters specifically admitted herein as follows. Lantower admits that Plaintiffs purport to bring

this action as a putative class action as defined in Paragraph 681, but otherwise denies that there is a properly certifiable class as defined in Paragraph 681.

682. Lantower denies all of the allegations of paragraph 682, with the exception of matters specifically admitted herein as follows. Lantower admits that Plaintiffs purport to bring this action as a putative class action as defined in Paragraph 682, but otherwise denies that there is a properly certifiable class as defined in Paragraph 682.

683. Lantower lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 683, and therefore denies them.

684. Lantower denies each and every allegation of Paragraph 684 and its subparts. Lantower specifically denies that Plaintiffs have suffered any injury or damages as a result of any alleged conduct by Lantower, or that they have sufficiently stated any claims for relief against Lantower.

685. Lantower denies each and every allegation of Paragraph 685.

686. Lantower denies each and every allegation of Paragraph 686.

687. Lantower denies each and every allegation of Paragraph 687.

688. Lantower denies each and every allegation of Paragraph 688.

689. Lantower denies each and every allegation of Paragraph 689.

690. Lantower denies each and every allegation of Paragraph 690.

### **VIII. Allegations Concerning Purported Antitrust Injury**

691. To the extent that the allegations of Paragraph 691 and its subparts relate to other defendants or persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 691 and its subparts relate to Lantower, Lantower denies all of those allegations.

692. Lantower denies each and every allegation of Paragraph 692.

693. Lantower denies each and every allegation of Paragraph 693.

**IX. Allegations Concerning Purported Continuing Violation**

694. Lantower denies each and every allegation of Paragraph 694.

695. Lantower denies each and every allegation of Paragraph 695.

696. Lantower denies each and every allegation of Paragraph 696.

697. To the extent that the allegations of Paragraph 697 relate to other defendants or persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 697 relate to Lantower, Lantower denies all of those allegations.

698. To the extent that the allegations of Paragraph 698 relate to other defendants or persons, Lantower lacks knowledge or information sufficient to form a belief as to their truth, and therefore denies them. To the extent that the allegations of Paragraph 698 relate to Lantower, Lantower denies all of those allegations.

699. Lantower denies each and every allegation of Paragraph 699.

700. Lantower denies each and every allegation of Paragraph 700.

**X. Allegations Concerning Plaintiffs' Claims for Relief**

**COUNT I**  
**Price Fixing in Violation of**  
**Section 1 of the Sherman Act (15 U.S.C. § 1)**

701. Lantower repeats and incorporates by reference its responses to Paragraphs 1 through 700 of the SAC with the same force and effect as if set forth herein at length.

702. Lantower avers that the allegations of Paragraph 702 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of those allegations.

703. Lantower denies each and every allegation of Paragraph 703.

704. Lantower denies each and every allegation of Paragraph 704.

705. Lantower denies each and every allegation of Paragraph 705, including its subparts.

706. Lantower avers that the allegations of Paragraph 706 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of those allegations.

707. Lantower denies each and every allegation of Paragraph 707.

**COUNT II**  
**Violation of State Antitrust Statutes**  
**(On behalf of Plaintiffs and the Class)**

708. Lantower repeats and incorporates by reference its responses to Paragraphs 1 through 707 of the SAC with the same force and effect as if set forth herein at length.

709. Lantower avers that the allegations of Paragraph 709 constitute legal contentions and/or conclusions to which no response is required, but Lantower nonetheless denies all of those allegations.

710. Lantower denies each and every allegation of Paragraph 710.

711. Lantower denies each and every allegation of Paragraph 711.

712. Lantower denies each and every allegation of Paragraph 712.

713. Lantower denies each and every allegation of Paragraph 713.

714. Lantower denies each and every allegation of Paragraph 714.

715. Lantower denies each and every allegation of Paragraph 715.

716. Lantower denies each and every allegation of Paragraph 716.

717. Lantower denies each and every allegation of Paragraph 717.

718. Lantower denies each and every allegation of Paragraph 718.

719. Lantower denies each and every allegation of Paragraph 719.

720. Lantower denies each and every allegation of Paragraph 720.

721. Lantower denies each and every allegation of Paragraph 721.

722. Lantower denies each and every allegation of Paragraph 722.

723. Lantower denies each and every allegation of Paragraph 723.

724. Lantower denies each and every allegation of Paragraph 724.

725. Lantower denies each and every allegation of Paragraph 725.

726. Lantower denies each and every allegation of Paragraph 726.

727. Lantower denies each and every allegation of Paragraph 727.

728. Lantower denies each and every allegation of Paragraph 728.

729. Lantower denies each and every allegation of Paragraph 729.

730. Lantower denies each and every allegation of Paragraph 730.

731. Lantower denies each and every allegation of Paragraph 731.

732. Lantower denies each and every allegation of Paragraph 732.

733. Lantower denies each and every allegation of Paragraph 733.

734. Lantower denies each and every allegation of Paragraph 734.

735. Lantower denies each and every allegation of Paragraph 735.

736. Lantower denies each and every allegation of Paragraph 736.

737. Lantower denies each and every allegation of Paragraph 737.

738. Lantower denies each and every allegation of Paragraph 738.

- 739. Lantower denies each and every allegation of Paragraph 739.
- 740. Lantower denies each and every allegation of Paragraph 740.
- 741. Lantower denies each and every allegation of Paragraph 741.
- 742. Lantower denies each and every allegation of Paragraph 742.
- 743. Lantower denies each and every allegation of Paragraph 743.
- 744. Lantower denies each and every allegation of Paragraph 744.
- 745. Lantower denies each and every allegation of Paragraph 745.
- 746. Lantower denies each and every allegation of Paragraph 746.
- 747. Lantower denies each and every allegation of Paragraph 747.
- 748. Lantower denies each and every allegation of Paragraph 748.
- 749. Lantower denies each and every allegation of Paragraph 749.
- 750. Lantower denies each and every allegation of Paragraph 750.
- 751. Lantower denies each and every allegation of Paragraph 751.
- 752. Lantower denies each and every allegation of Paragraph 752.
- 753. Lantower denies each and every allegation of Paragraph 753.
- 754. Lantower denies each and every allegation of Paragraph 754.

#### **XI. Allegations Concerning Plaintiffs' Prayer for Relief and Jury Trial Demand**

Lantower denies that Plaintiffs have suffered any injury or incurred any damages by any act or omission of Lantower as alleged in the SAC, and further denies that Plaintiffs are entitled to any relief under any theory by means of the allegations set forth in the SAC. Furthermore, Lantower avers that Plaintiffs Priscilla Parker and Patrick Parker have waived their rights to a jury trial in their leases for housing at the Lantower Asturia. Lantower has at all times enforced and will to continue to enforce these and any other applicable jury trial waivers by other Plaintiffs, and



Lantower specifically denies that Plaintiffs Priscilla Parker and Patrick Parker are entitled to a trial by jury with respect to the claims set forth in the SAC.

### **ADDITIONAL OR AFFIRMATIVE DEFENSES**

Without assuming any burden it would not otherwise bear, Lantower asserts the following additional and/or affirmative defenses to Plaintiffs' SAC:

#### **FIRST ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Failure to State a Claim)**

The SAC fails to state a claim upon which relief can be granted.

#### **SECOND ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Waiver and Estoppel)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, by the doctrines of waiver and/or estoppel.

#### **THIRD ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Laches)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, by the equitable doctrine of laches.

#### **FOURTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Unclean Hands)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, by the equitable doctrine of unclean hands.

#### **FIFTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Remedies Unconstitutional, Unauthorized or Contrary to Public Policy)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because the remedies sought are unconstitutional, contrary to public policy, or are otherwise unauthorized.

#### **SIXTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Absence of Damages)**

Plaintiffs' claims should be dismissed because Plaintiffs and/or certain members of the putative class have suffered no injury or damages as a result of the matters alleged in the SAC. To the extent that Plaintiffs and/or certain members of the putative class purportedly suffered injury or damage, which Lantower specifically denies, Lantower further contends that any such purported injury or damage was not by reason of any act or omission of Lantower.

#### **SEVENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(No Antitrust Injury)**

Plaintiffs' claims should be dismissed because Plaintiffs and/or certain members of the putative class have not suffered actual, cognizable antitrust injury of the type antitrust laws are intended to remedy.

#### **EIGHTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Uncertainty of Damages)**

Plaintiffs' claims should be dismissed because the alleged damages sought are too speculative and uncertain, and cannot be practicably ascertained or allocated.

#### **NINTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Failure to Mitigate Damages)**

Plaintiffs' claims should be dismissed, in whole or in part, because Plaintiffs and/or certain members of the putative class failed to take all necessary, reasonable, and appropriate actions to mitigate their alleged damages, if any.

#### **TENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Statutes of Limitations)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, by the applicable statute(s) of limitations.

#### **ELEVENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Unjust Enrichment)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because Plaintiffs and/or certain members of the putative class would be unjustly enriched if they were allowed to recover any part of the damages alleged in the SAC.

#### **TWELFTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

##### **(Lack of Proximate Cause)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, due to the absence of any injury or damage for which Lantower's actions, conduct, or omissions were the proximate cause.

**THIRTEENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Adequate Remedy at Law)**

Plaintiffs' claims for injunctive relief should be dismissed because Plaintiffs and/or certain members of the putative class have available an adequate remedy at law.

**FOURTEENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Privilege)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because any action taken by or on behalf of Lantower was justified, constituted bona fide business competition and was taken in pursuit of its own legitimate business and economic interests, and is therefore privileged.

**FIFTEENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Non-actionable or Government Privilege)**

Plaintiffs' claims are barred, in whole or in part, because the alleged conduct of Lantower that is the subject of the SAC was caused by, due to, based upon, or in response to directives, laws, regulations, policies, and/or acts of governments, governmental agencies and entities, and/or regulatory agencies, and such is non-actionable or privileged.

**SIXTEENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Jury Trial Waiver)**

Plaintiffs' claims and demands for a jury trial are barred, in whole or in part, because Plaintiffs have entered into enforceable lease agreements waving their rights to a trial by jury, including in their agreements with Lantower.

## **SEVENTEENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

### **(Comparative Fault)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because any and all injuries alleged in the SAC, the fact and extent of which Lantower specifically denies, were directly and proximately caused or contributed to by the statements, acts, and/or omissions of Plaintiffs, certain members of the putative class, and/or third parties or entities, other than Lantower.

## **EIGHTEENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

### **(Acquiescence)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, by Plaintiffs' and/or certain members of the putative class acquiescence and/or confirmation of any and all conduct and/or omissions alleged as to Lantower.

## **NINETEENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

### **(Class Action Waiver)**

Plaintiffs' claims and are barred, in whole or in part, because Plaintiffs have entered into enforceable lease agreements waving their rights to invoke the class action procedural device and/or participate as plaintiffs in class action litigation.

## **TWENTIETH ADDITIONAL OR AFFIRMATIVE DEFENSE**

### **(Uncertainty)**

Plaintiffs' claims should be dismissed for uncertainty and vagueness and because their claims are ambiguous, and/or unintelligible. Lantower avers that Plaintiffs' claims do not describe the events or legal theories with sufficient particularity to permit Lantower to ascertain what other defenses may exist. Lantower therefore reserves the right to amend its Answer to assert additional

defenses and/or supplement, alter, or change its Answer and/or defenses upon the discovery of more definitive facts upon the completion of its investigation and discovery.

**TWENTY-FIRST ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Lack of Standing to Sue for Injuries Alleged)**

Plaintiffs' claims should be dismissed, in whole or in part, to the extent Plaintiffs lack standing to sue for the injuries alleged in the SAC.

**TWENTY-SECOND ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Competition Not Harmed)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because Lantower's actions did not lessen competition in the relevant market(s).

**TWENTY-THIRD ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Intervening or Superseding Acts of Third Parties)**

Plaintiffs' damages, if any, resulted from the acts or omissions of third parties over whom Lantower had no control or responsibility. The acts of such third parties constitute intervening or superseding causes of harm, if any, suffered by Plaintiffs.

**TWENTY-FOURTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Injury or Damages Offset by Benefits Received)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because any claimed injury or damage has been offset by benefits Plaintiffs received with respect to the challenged conduct.

**TWENTY-FIFTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Increased Output and Lower Prices)**

Lantower, without admitting the existence of any contract, combination, or conspiracy in restraint of trade as alleged in the SAC, avers that the matters about which Plaintiffs complain resulted in increased output and lower prices.

**TWENTY-SIXTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Failure to Plead Conspiracy with Particularity)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because Plaintiffs have failed to allege conspiracy with sufficient particularity.

**TWENTY-SEVENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(No Detrimental Reliance)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because Plaintiffs did not detrimentally rely upon any alleged deceptive trade conduct as alleged in the SAC.

**TWENTY-EIGHTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Set Off)**

Without admitting that Plaintiffs are entitled to recover damages in this matter, Lantower is entitled to set off from any recovery Plaintiffs may obtain against Lantower any amount paid to Plaintiffs by any other Defendants who have settled, or do settle, Plaintiffs' claims in this matter.

**TWENTY-NINTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Failure to State a Claim for Injunctive Relief)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because Plaintiffs have failed to state a claim for injunctive relief insofar as Plaintiffs seek to enjoin alleged events that have already transpired without the requisite showing of threatened harm or continuing harm.

**THIRTIETH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Lack of Jurisdiction)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because any alleged conduct of Lantower occurred outside of the jurisdiction of the Court and/or because the State laws Plaintiffs purport to invoke do not apply to conduct occurring outside of the relevant States.

**THIRTY-FIRST ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(No Attorney Fees Allowed)**

An award of attorneys' fees, based upon the conduct alleged in the SAC, is not allowed under applicable federal or state law.

**THIRTY-SECOND ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Lack of Standing)**

Plaintiffs' claims are barred by Plaintiffs' lack of standing to prosecute the claims individually or as a class action.



**THIRTY-THIRD ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Lack of Commonality)**

Plaintiffs' claims are improperly joined within the meaning of the Federal Rule of Civil Procedure 20 or 23 because they did not arise out of the same transaction, occurrence, or series of transactions or occurrences, and/or do not involve questions of law or fact common to all defendants.

**THIRTY-FOURTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Lack of Typicality)**

Plaintiffs' claims are improperly joined within the meaning of the Federal Rule of Civil Procedure 23 because they are not typical of the claims of the other members of the putative class.

**THIRTY-FIFTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Plaintiffs are Not Proper Representatives)**

Plaintiffs' claims are barred, in whole or in part, because the named Plaintiffs are not proper class representatives.

**THIRTY-SIXTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(No Unreasonable Restraint of Trade)**

Plaintiffs' claims are barred, in whole or in part, because the alleged conduct of Lantower did not unreasonably restrain trade.

**THIRTY-SEVENTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Voluntary Payment)**

Plaintiffs' claims are barred, in whole or in part, by the voluntary payment doctrine, under which one cannot recover payments with full knowledge of the facts.

**THIRTY-EIGHTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Proportionality)**

To the extent Lantower is found liable for damages, the fact and extent of which are expressly denied by Lantower, those damages must be reduced in proportion to Lantower's degree of fault.

**THIRTY-NINTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Forum Non Conveniens)**

Plaintiffs' claims are barred, in whole or in part, because of the doctrine of forum non conveniens.

**FORTIETH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Permitted by Law)**

Plaintiffs' claims are barred, in whole or in part, to the extent they are based on alleged acts, conduct or statements that are specifically permitted by law.

**FORTY-FIRST ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Multiple Recoveries)**

To the extent Plaintiffs' claims would result in Lantower paying damages to more than one claimant for the same alleged overcharge, they are barred because such multiple recoveries would violate rights guaranteed to Lantower by the U.S. Constitution and other law, including, without limitation, rights guaranteed under the Due Process Clause of the Fourteenth Amendment.

**FORTY-SECOND ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Release)**

The claims of one or more of the persons or entities Plaintiffs purport to represent are barred because they have been released.

**FORTY-THIRD ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Failure to Comply with State Law Notice Requirements)**

Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs have failed to comply with the notice requirements of the various State laws they purport to invoke.

**FORTY-FOURTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Other Defenses Incorporated by Reference)**

Lantower adopts and incorporates by reference any and all other additional or affirmative defenses asserted or to be asserted by any other defendant in this proceeding to the extent that Lantower may share in such affirmative defenses.

**FORTY-FIFTH ADDITIONAL OR AFFIRMATIVE DEFENSE**

**(Reservation of Rights to Assert Additional Defenses)**

Lantower has not knowingly or intentionally waived any applicable defenses and explicitly reserves the right to assert and rely on such other applicable defenses as may become available or apparent during discovery proceedings. Lantower further reserves the right to amend its Answer and/or its defenses accordingly, and/or to delete defenses that it determines are not applicable during the course of subsequent discovery.

WHEREFORE, Defendant Lantower prays for judgment as follows:

1. That Plaintiffs take nothing under the SAC, and the SAC be dismissed with prejudice;
2. That judgment be entered in favor of Defendant Lantower and against Plaintiffs on each and every cause of action set forth in the SAC;

3. That Defendant Lantower recover its costs of suit and attorneys' fees incurred herein; and
4. That Defendant Lantower be granted such other and further relief as the Court deems just and proper.

Respectfully submitted,

Date: February 5, 2024

/s/ Michael W. Scarborough

Michael W. Scarborough (admitted *pro hac vice*)

Dylan I. Ballard (admitted *pro hac vice*)

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*Counsel for Defendant*

*Lantower Luxury Living LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 5, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all attorneys of record registered on the CM/ECF system.

/s/ Michael W. Scarborough

Michael W. Scarborough